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Attorneys for Plaintiff SkipPrint, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

SKIPPRINT, LLC,
a Delaware corporation,

Plaintiff,

v.

VISION GRAPHICS, INC.,
a Wyoming corporation,

Defendant.

**ANSWER TO VISION GRAPHICS,
INC.'S COUNTERCLAIMS**

Civil Case No. 2:13-cv-00678-DB

Judge Dee Benson

JURY DEMAND

Plaintiff and Counterclaim-Defendant SkipPrint, LLC (“SkipPrint”), by and through its attorneys of record, hereby responds to the Counterclaims of Defendant and Counterclaim-Plaintiff Vision Graphics, Inc. (“Vision”) as follows:

THE PARTIES

1. SkipPrint admits the allegations of paragraph 1.
2. SkipPrint admits the allegations of paragraph 2.

JURISDICTION AND VENUE

3. SkipPrint admits that this Court has jurisdiction over the subject matter of the Counterclaims, and that venue is proper. The remainder of paragraph 3 contains statements to which no response is necessary.

4. SkipPrint admits the allegations of paragraph 4.

BACKGROUND

5. SkipPrint admits the allegations of paragraph 5.

**FIRST COUNTERCLAIM
DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF THE '080 PATENT**

6. SkipPrint incorporates by reference its answers to paragraphs 1 through 5 above as though fully set forth herein.

7. SkipPrint denies the allegations of paragraph 7.
8. SkipPrint admits the allegations of paragraph 8.
9. SkipPrint denies the allegations of paragraph 9.

**SECOND COUNTERCLAIM
DECLARATORY JUDGMENT OF INVALIDITY OF THE '080 PATENT**

10. SkipPrint incorporates by reference its answers to paragraphs 1 through 9 above as though fully set forth herein.
11. SkipPrint denies the allegations of paragraph 11.
12. SkipPrint admits the allegations of paragraph 12.
13. SkipPrint denies the allegations of paragraph 13.

**THIRD COUNTERCLAIM
DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF THE '493 PATENT**

14. SkipPrint incorporates by reference its answers to paragraphs 1 through 13 above as though fully set forth herein.
15. SkipPrint denies the allegations of paragraph 15.
16. SkipPrint admits the allegations of paragraph 16.
17. SkipPrint denies the allegations of paragraph 17.

**FOURTH COUNTERCLAIM
(DECLARATORY JUDGMENT OF INVALIDITY OF THE '080 PATENT)**

18. SkipPrint incorporates by reference its answers to paragraphs 1 through 17 above as though fully set forth herein.
19. SkipPrint denies the allegations of paragraph 19.
20. SkipPrint admits the allegations of paragraph 20.
21. SkipPrint denies the allegations of paragraph 21.

**FIFTH COUNTERCLAIM
DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF THE '995 PATENT**

22. SkipPrint incorporates by reference its answers to paragraphs 1 through 21 above as though fully set forth herein.
23. SkipPrint denies the allegations of paragraph 23.
24. SkipPrint admits the allegations of paragraph 24.
25. SkipPrint denies the allegations of paragraph 25.

**SIXTH COUNTERCLAIM
DECLARATORY JUDGMENT OF INVALIDITY OF THE '995 PATENT**

26. SkipPrint incorporates by reference its answers to paragraphs 1 through 25 above as though fully set forth herein.
27. SkipPrint denies the allegations of paragraph 27.
28. SkipPrint admits the allegations of paragraph 28.
29. SkipPrint denies the allegations of paragraph 29.

**SEVENTH COUNTERCLAIM
DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF THE '596 PATENT**

30. SkipPrint incorporates by reference its answers to paragraphs 1 through 29 above as though fully set forth herein.
31. SkipPrint denies the allegations of paragraph 31.
32. SkipPrint admits the allegations of paragraph 32.
33. SkipPrint denies the allegations of paragraph 33.

**EIGHTH COUNTERCLAIM
(DECLARATORY JUDGMENT OF INVALIDITY OF THE '596 PATENT)**

34. SkipPrint incorporates by reference its answers to paragraphs 1 through 33 above as though fully set forth herein.
35. SkipPrint denies the allegations of paragraph 35.
36. SkipPrint admits the allegations of paragraph 36.
37. SkipPrint denies the allegations of paragraph 37.

**NINTH COUNTERCLAIM
(DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF THE '641 PATENT)**

38. SkipPrint incorporates by reference its answers to paragraphs 1 through 37 above as though fully set forth herein.
39. SkipPrint denies the allegations of paragraph 39.
40. SkipPrint admits the allegations of paragraph 40.
41. SkipPrint denies the allegations of paragraph 41.

**TENTH COUNTERCLAIM
(DECLARATORY JUDGMENT OF INVALIDITY OF THE '641 PATENT)**

42. SkipPrint incorporates by reference its answers to paragraphs 1 through 41 above as though fully set forth herein.
43. SkipPrint denies the allegations of paragraph 43.
44. SkipPrint admits the allegations of paragraph 44.
45. SkipPrint denies the allegations of paragraph 45.

PRAYER FOR RELIEF

WHEREFORE, SkipPrint respectfully requests that this Court enter judgment in favor of SkipPrint and against Vision as follows:

1. That Vision take nothing by way of its counterclaims;
2. That the Court enter judgment in favor of SkipPrint as requested in SkipPrint's complaint, as amended or supplemented;
3. That SkipPrint recover its fees, expenses, and costs.

Dated: May 30, 2014

Respectfully submitted,

/s/C.J. Veverka

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